



State of Utah

Department of Natural Resources

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas & Mining

JOHN R. BAZA
Division Director

JON M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

January 20, 2006

Dean Willden
Perpetual Storage, Inc.
6279 East Little Cottonwood Road
Sandy, Utah 84092

Subject: Release Requirements, Perpetual Storage, Inc., Perpetual Storage Vault,
S/035/013, Salt Lake County, Utah

Dear Mr. Willden:

On December 22, 2005, Division of Oil, Gas and Mining inspector Paul Baker visited the site of Perpetual Storage's vault for the purpose of determining whether it still falls within the definition of "mining operations" as defined in the Mined Land Reclamation Act (the Act). The enclosed report discusses his findings and recommendations.

While it is clear no mining operations are currently being conducted, it is also necessary to evaluate whether past activities have been adequately reclaimed to a suitable postmining land use. The majority of the site is part of your commercial storage operation, and the Division considers this area to be reclaimed. The only remnants from past operations that have not been included as part of the land use, and thus have not been reclaimed, are the old access road and the horizontal drill hole.

Based on information you provided, it appears the old access road has not been used since 1975 when the Act was passed. Therefore, the Division will not consider this disturbance subject to the requirements of the Act. The horizontal hole was drilled more recently, and, unless there is a reason for keeping it to facilitate a postmining land use, it needs to be plugged.

Portions of the PVC pipe within three feet of the surface should be removed, and the remaining pipe should be plugged with concrete then covered over with soil. Alternatively, the pipe could be removed completely and the void filled with earth materials.

Reclamation is not required at this time if Perpetual Storage desires to keep its Notice of Intention to Commence Small Mining Operations open, but, in this case,

Dean Willden
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it will be necessary for you to continue to pay annual permit fees. Within about the next year, you will need to provide a reclamation surety if your Notice is still open.

Please inform the Division what action you intend to take. If you have questions about this letter or about the reclamation requirements, please call Paul Baker at 801-538-5261. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink that reads "Susan M. White". The signature is written in a cursive style with a long, sweeping underline.

Susan M. White
Mining Program Coordinator
Minerals Regulatory Program

SMW:PBB:pb
Enclosure: Inspection Report with Photos
P:\GROUPS\MINERALS\WP\M035-SaltLake\S0350013-Perpetualstorage\final\ltr-rel-01062006.doc



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Inspection Report

Minerals Regulatory Program

Report Date January 6, 2006

Supervisor 1027

Mine Name: Perpetual Storage Vault
Operator Name: Perpetual Storage, Inc.

Permit number: S/035/013
Inspection Date: December 22, 2005
Time: 1:10-1:30 PM

Inspector(s): Paul Baker
Other Participants: Dean Willden, Perpetual Storage
Mine Status: Reclaimed

Weather: Cloudy, 40's, patchy snow
on the ground

Elements of Inspection	Evaluated	Comment	Enforcement
1. Permits, Revisions, Transfer, Bonds	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Public Safety (shafts, adits, trash, signs, highwalls)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Protection of Drainages / Erosion Control	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Deleterious Material	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Roads (maintenance, surfacing, dust control, safety)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Concurrent Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Backfilling/Grading (trenches, pits, roads, highwalls, shafts, drill holes)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Water Impoundments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Soils	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Revegetation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Air Quality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Other	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Purpose of Inspection:

The operator verbally requested that the small mine notice be closed.

Inspection Summary:

1. Permits, Revisions, Transfer, Bonds

This site consists of a tunnel into bedrock on the north side of Little Cottonwood Canyon together with a road, a parking area, and buildings at the entrance to the tunnel. It is being used to store critical information, primarily computer disks, and the operator maintains tight security.

Most of the disturbance was created in 1968 prior to passage of the Mined Land Reclamation Act. Mr. Willden said his company at one time contemplated expanding the vault, and they drilled about 350 feet horizontally into the mountain. The site was apparently permitted at that time.

2. Public Safety (shafts, adits, trash, signs, highwalls)

A PVC pipe extends out from where the operator drilled (Photo 1). There was a small stream of water coming from this pipe during the inspection. Mr. Willden thought this pipe extended about 50 feet into colluvium but not into the bedrock.

3. Protection of Drainages / Erosion Control

There is an ephemeral drainage that comes down from the mountain (Photo 7), goes along the edge of the disturbed area, then through a culvert under the access road where it joins the parking lot (Photo

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8). I remarked to Mr. Willden that I thought there would be times when this culvert would not be adequate to handle the flow, and he confirmed my suspicion. If the culvert was overtopped, water would simply flow across the road (some might go down the road) and on to the rock outslope on the south side.

There are two culverts that drain water from the parking lot to the rock outslope.

Because of the rock on the surface of the outslope, there appears to be little erosion that comes from this area.

5. Roads

The original access road is shown in Photo 3. This road was not paved and had no guard rail. Some vegetation has become established on this road, but the cover does not match surrounding areas.

10. Revegetation

The outslope of the pad is shown in Photo 2. The surface is almost entirely covered with rock, and there is little vegetation.

12. Other

The entrance building and the wall at the tunnel entrance are shown in Photos 4 and 5.

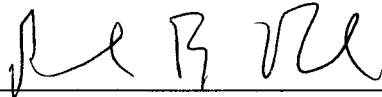
Conclusions and Recommendations:

In the future, it is possible the operator may excavate a new tunnel, but no mining is occurring at this time. The site is being used for a commercial venture not related to mining, and it has been reclaimed to this alternate postmining land use.

The only remaining issues relating to reclamation are the old access road and the unplugged horizontal drill hole. The road has not been used since about 1975, so it is not regulated under the Mined Land Reclamation Act.

Prior to release, I suggest that the drill hole be plugged.

Inspector's Signature



Date:

1/17/06

Directions to Site:

The site is on the north side of Little Cottonwood Canyon, and the turnoff is near mile marker 6.

PBB:pb

cc: Dean Willden, Perpetual Storage

Attachment: GPS & Photos

ATTACHMENT

Photographs

S/035/013, Perpetual Storage Vault, Perpetual Storage, Inc.

Inspection Dated: December 25, 2005; Report Dated: January 6, 2006

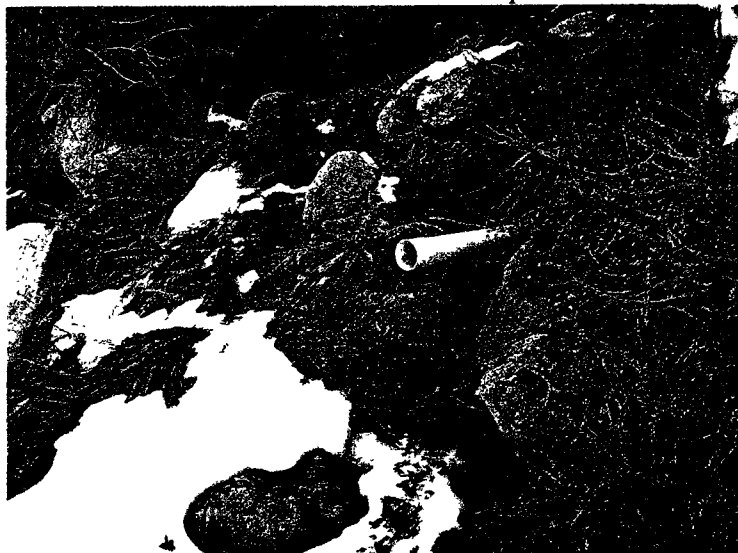


Photo 1. PVC pipe extending from where the operator drilled horizontally into the mountain.



Photo 3. The original access road.

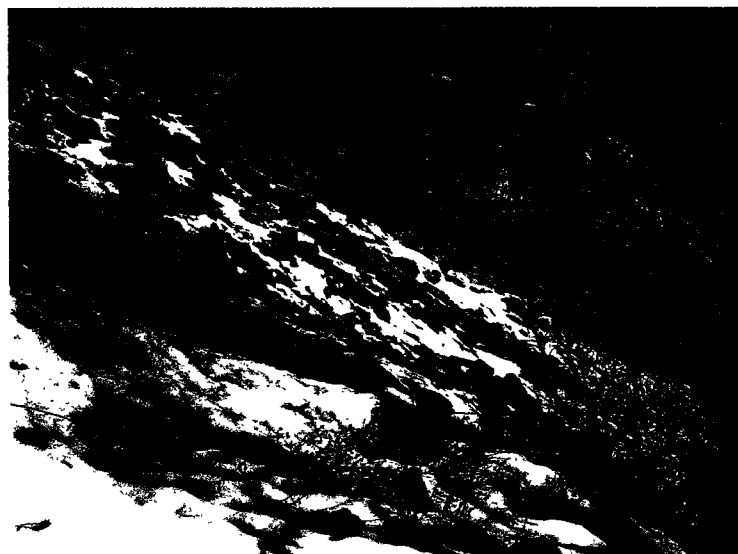


Photo 2. The outslope of the parking lot—waste material from tunnel excavation.

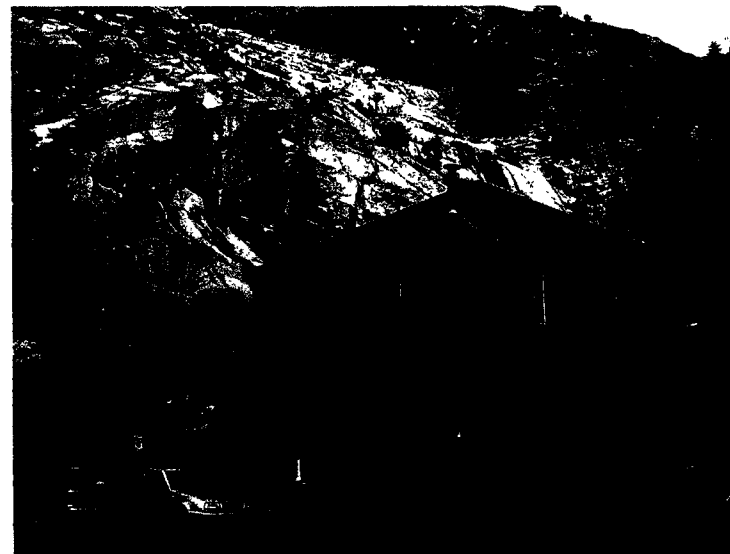


Photo 4. Entrance to the vault.



Photo 5. Wall at the outside of the tunnel.



Photo 6. Ephemeral drainage channel above the site.

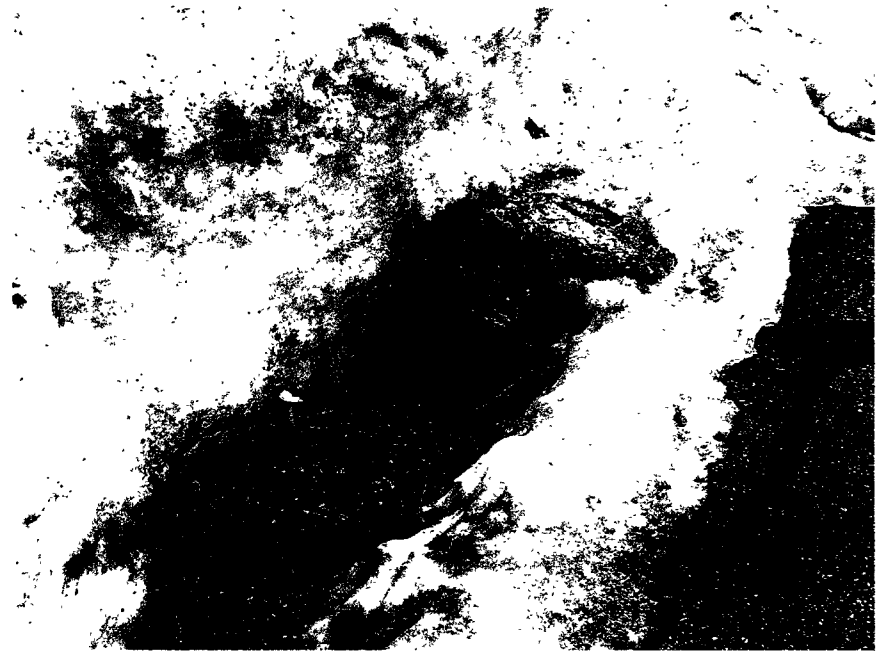


Photo 7. Runoff from the channel shown in Photo 6 flow through this culvert (or over it).

ATTACHMENT

Photographs

S/035/013, Perpetual Storage Vault, Perpetual Storage, Inc.

Inspection Dated: December 25, 2005; Report Dated: January 6, 2006

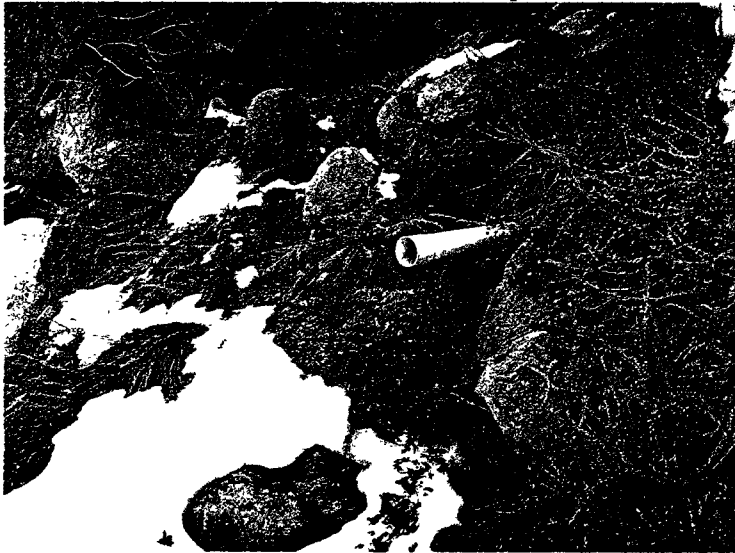


Photo 1. PVC pipe extending from where the operator drilled horizontally into the mountain.



Photo 3. The original access road.

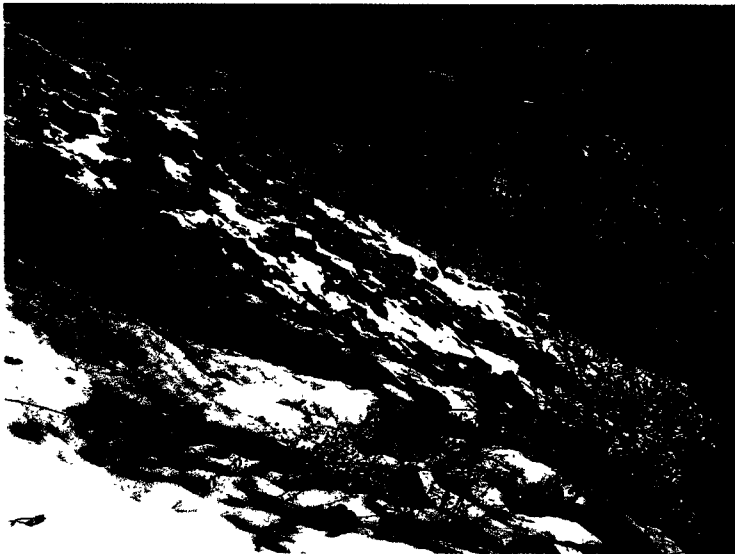


Photo 2. The outslope of the parking lot--waste material from tunnel excavation.

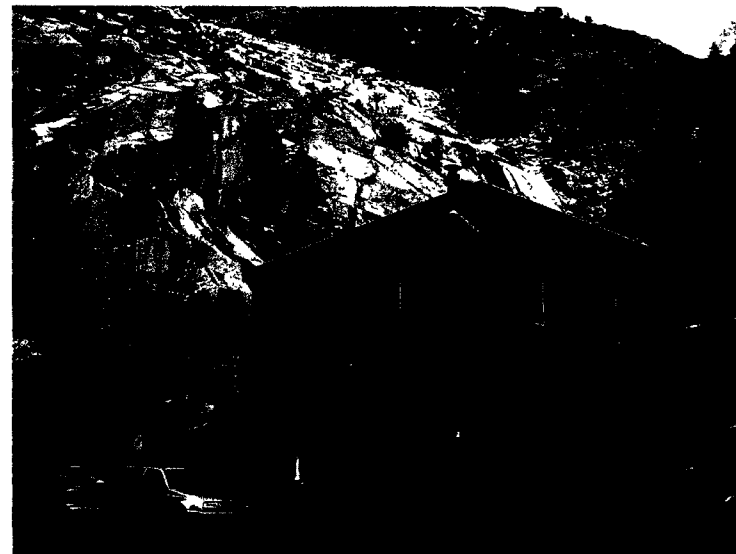


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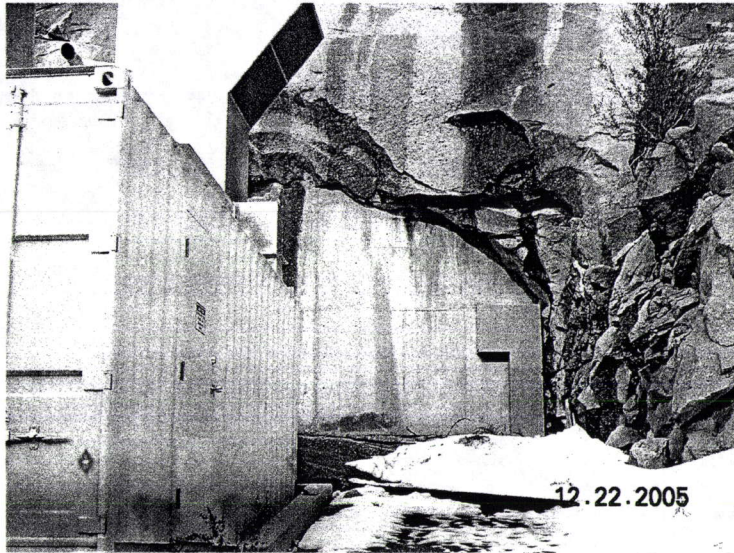


Photo 5. Wall at the outside of the tunnel.

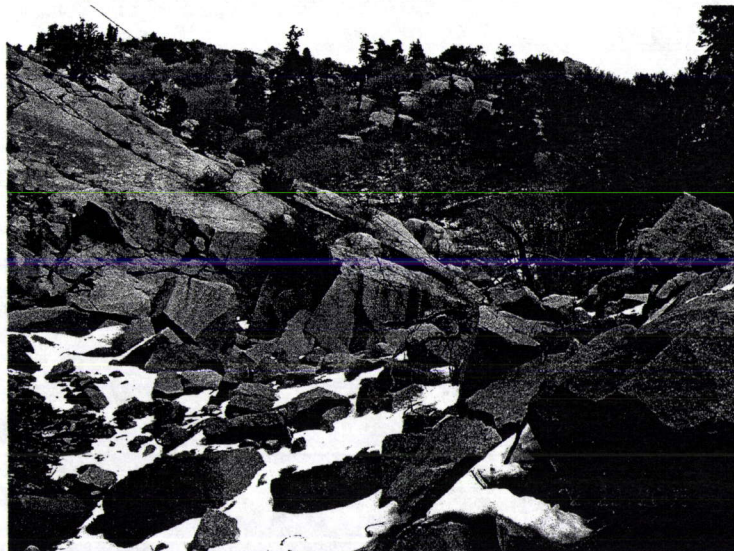


Photo 6. Ephemeral drainage channel above the site.



Photo 7. Runoff from the channel shown in Photo 6 flow through this culvert (or over it).